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U S NAVY RESPONSE TO U S EPA REGION III COMMENTS TO DRAFT PROPOSED PLAN
SITE 30 NWS YORKTOWN VA
9/14/2009
CH2M HILL

**CH2MHILL**

September 14, 2009

386475.RP.DF

Mr. Robert Thomson, P.E., R.E.M.
Office of Federal Facility Remediation
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to Comments on *Draft Proposed Plan, Site 30: The Bracken Road Incinerator; Naval Weapons Station Yorktown, Yorktown, Virginia*

Dear Mr. Thomson:

This letter is in response to your comments on the subject document provided in your e-mail dated July 20, 2009. Comments are presented, shown in italics, followed by the Navy's response in Blue.

1. Title - *I monkeyed around with the graphic at the bottom to make it fit within the space.*

The requested formatting changes have been made to the document text.

2. Section 1, Paragraph 2 - *Please protect against orphaned lines in final.*

The requested formatting changes have been made to the document text.

3. Section 1, Paragraph 3 - *I've started deleting the specific SARA amendments reference because CERCLA has since been amended by the brownfields amendments in 2002, and we can't list every amendment.*

The requested change has been made.

4. Section 2, Paragraph 1 - *"mission of the Station"? Is this synonymous with "quality/status/contamination of the Site"? Clarify phrase.*

The text was changed from "Station" to "Base" in order to clarify.

5. Section 2, Paragraph 1 - *If the RR tracks are used as a directional reference, they should be referenced/labeled in Figure 1. (Alternatively, the roads could be used as a proximate reference pt for Fig. 1).*

The location of the railroad tracks has been added to the figure for reference.

6. Section 2, Paragraph 1 - From fig 1 it appears that the NW part of the site extends off-installation. Is that right? If so, please add a sentence to the end of this paragraph explaining that and indicating the owner of the property.

The figure was amended in order to clarify property ownership and the text was amended to read:

"Sediment samples for these investigations were collected on both sides of the WPNSTA Yorktown boundary. The property adjacent to WNSTA Yorktown is owned by U.S. Department of Interior (DOI) National Parks Services. Permission was requested and granted to collect these samples. These previous investigations are summarized below."

In addition, the figure has been modified in order to show the true boundary of Site 30. The previous boundary was a reflection of the Site 30 Study Area, encompassing the total area from which samples had been collected, both up and downgradient.

7. Section 2, Paragraph 2 - The inset on the figure is illegible. Enlarge or delete it.

The figure was amended in order to make the figure more legible.

8. Section 2, AOC 22, Site 12, SSA 2, SSA 19, and King Creek Independent Sampling and Risk Screening Report (Black and Veatch, 1996) - Regarding Table 1—do not introduce acronyms in the titles to documents. (the acronyms aren't actually in the titles on the page of the document, are they?)

The requested formatting changes have been made to the document text.

9. Section 2, AOC 22, Site 12, SSA 2, SSA 19, and King Creek Independent Sampling and Risk Screening Report (Black and Veatch, 1996) - Title of this document differs from that listed in Table 1. Please reconcile.

The requested amendments have been made to the document text.

10. Section 2, Groundwater Data Review and Risk Management Consideration Tech Memo (CH2M HILL, 2009) - Please add text explaining why TCE was detected in the direct-push sample from 2001, even if conjecture. Lab contamination of sample? TCE was in the soil that was removed in the NTCRA, not the gw?

In order to clarify, the document text was amended to read:

"Based on these sample results and the fact that neither TCE nor its daughter products were detected in any other media during sampling events, the Navy, USEPA Region 3, and VDEQ agreed that the low, estimated organic concentrations detected in monitoring well A24GW02 in 2001 were the result of lab error and not representative of groundwater conditions. VOCs had not been released into the

groundwater, and, consequently, no further investigation or remedial action was required for groundwater at Site 30."

11. Section 3 - Make sure that all headings have at least two lines of text after them in the final PRAP. (Protect against bad breaks as here.)

The requested formatting changes have been made to the document text.

12. Section 4, Paragraph 1 - Please add more substance about the NPL site as a whole. See EPA's ROD guidance, section 3.3.4. This section is about the NPL site as a whole, not just the site at issue here.

The text has been amended to read:

"WPNSTA Yorktown was placed on the **National Priorities List (NPL)** in October 1992. An FFA, signed in 1994, identified 16 Sites for RI and 19 Site Screening Areas (SSAs) for the Site Screening Process (SSP). Subsequent to the FFA, 6 additional SSAs were identified for consideration under CERCLA. Site 30 is one of 24 sites at WPNSTA Yorktown currently in various stages of being investigated, addressed and/or closed out in accordance with CERCLA and the NCP. A summary of how the Navy, in partnership with the USEPA Region 3 and VDEQ, is addressing all CERCLA sites at WPNSTA Yorktown is provided in the **Site Management Plan (SMP)**, which is updated annually and available in the AR file."

13. Section 4, Paragraph 1 - How many?

This comment regarding the number of Sites and SSAs at WPNSTA Yorktown was addressed with the response to Comment 12 above.

14. Section 5, Paragraph 2 - In Section 5 (and its subsections), no numerical data is given to support determination (i.e. HI = ..., which is less risk than the acceptable threshold level (HI<1) and cancer risk). Some data per medium analyzed helpful for community's determination if sufficient testing done and NFA preferred alternative.

The text has been amended to read:

"**The Human Health Risk Assessment (HHRA)** identified potential unacceptable non-cancer hazards (HI > 1) for current receptors from ingestion and dermal contact with vanadium in soils. Under RME assumptions, potential unacceptable non-cancer hazards for current and future adult trespassers (HI = 4.86), current and future adolescent trespassers (HI = 5.15), future adult industrial workers/commercial workers (HI = 28.56), construction workers (HI = 1.62), adult residents (HI = 18.12), and child residents (HI = 106.16) were identified from ingestion and dermal contact with vanadium in soils."

15. Section 5.2, Groundwater - Justification as to why the 2009 report made that conclusion is necessary, either here or at the end of Section 2 (at comment S10) is necessary.

This comment was addressed with the response to Comment 10 above.

16. *Section 5, What is Human Health Risk and How is it Calculated? - Section 1 indicates that bolded text was to indicate terms in glossary. The bolded terms in this box aren't in the back: either unbold or put in glossary.*

Terms that are defined in-text were unbolded and terms which are not defined in-text were left bolded and added to the glossary.

17. *Section 5.3, Sediment - The text box for ERA process looks terrible. Maybe move it entirely to the next page?*

The requested formatting changes have been made to the document text.

18. *Section 5, What is Ecological Risk and How is it Calculated? - See previous comment about bold terms. Alternatively, can unbold and give example "...background concentrations (i.e. ...)"*

This comment was addressed with the response to Comment 14 above.

19. *Section 5, What is Ecological Risk and How is it Calculated? - I don't know if there needs to be a section explaining the nine evaluation criteria used to assess a remedy if the remedy is NFA. If so, it should probably go before this next "preferred alternative" section*

As no other remedial options are being addressed in this proposed plan, it is felt that a discussion of the nine evaluation criteria is not necessary. No changes were made.

20. *Section 7, Paragraph 1 - I recommend that you include an end time for the meeting so you'll know when you can leave if no one attends.*

This information will be included when the document goes draft final and a public meeting has been officially scheduled.

In addition, all individual editorial changes made within the document have been accepted and retained and are not discussed on a case by case basis within this letter. If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6273.

Sincerely,

CH2M HILL



Stephanie Sawyer
Project Manager

cc: Ms. Tom Kowalski/NAVFAC
Mr. Rob Thompson/USEPA
Mr. Wade Smith/VDEQ
Ms. Bill Friedman/CH2M HILL